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 GOOGLE LLC

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

ADTRADER, INC., CLASSIC AND FOOD  
 EOOD, LML CONSULT LTD., AD  
 CRUNCH LTD., FRESH BREAK, LTD., and  
 SPECIALIZED COLLECTIONS BUREAU,  
 INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 5:17-CV-07082-BLF

**[PROPOSED] ORDER GRANTING  
 DEFENDANT GOOGLE LLC'S  
 ADMINISTRATIVE MOTION FOR A  
 PROTECTIVE ORDER**

Courtroom: 3  
 Judge: Hon. Beth Labson Freeman  
 Trial Date: June 6, 2022

Defendant Google LLC's ("Google") Administrative Motion for a Protective Order is before the Court pursuant to Local Rule 7-11. Having considered the papers filed in connection with the motion, and all other matters properly considered by this Court, the Court issues the following findings and orders:

IT IS HEREBY ORDERED THAT:

- 1) The clerk shall remove docket entries nos. 111-4, 111-6, 111-8, 115-3, 115-5, 119-4, 119-6, and 119-8 from the sealed record in this matter.
- 2) If the Court ultimately finds that Google's partial claim of privilege over the document with the bates number starting with GOOG-ADTR-00016152 is without merit, then Google and Plaintiffs shall within five court days of the Court's decision on the matter, re-file copies under seal

1 of these entries as they currently exist.

2 3) If the Court ultimately finds that GOOG-ADTR-00016152 is privileged in part, as  
3 Google contends, then Google shall re-file copies of docket entries 115-3, 115-5 in the sealed record  
4 with the privileged portions redacted. Google shall provide Plaintiffs with copies of docket entries  
5 111-4, 111-6, 111-8, 119-6, and 119-8 with the privileged portions redacted. Plaintiffs shall then,  
6 likewise, re-file these entries in the sealed record, with the privileged portions redacted.

7  
8 [ALTERNATIVE]

9  
10 1) The clerk shall remove docket entries nos. 111-4, 111-6, 111-8, 115-3, 115-5, 119-4,  
11 119-6, and 119-8 from the sealed record in this matter.

12 2) Google shall, within five court days of this order, re-file copies of docket entries 115-  
13 3, 115-5 in the sealed record with the privileged portions redacted. Google shall provide Plaintiffs  
14 with copies of docket entries 111-4, 111-6, 111-8, 119-6, and 119-8 with the privileged portions  
15 redacted. Plaintiffs shall then re-file these entries in the sealed record within five court days of this  
16 order.

17 3) If the Court ultimately finds that Google's partial claim of privilege over the document  
18 with the bates number starting with GOOG-ADTR-00016152 is without merit, the Clerk shall remove  
19 the re-filed versions of 111-4, 111-6, 111-8, 115-3, 115-5, 119-4, 119-6, and 119-8 from the sealed  
20 record in this matter. Google and Plaintiffs shall within five court days of the Court's decision denying  
21 Google's claim of privilege, re-file copies under seal of the original entries, as they currently exist on  
22 the date of this order.

23  
24 IT IS SO ORDERED.

25 Dated:

26 THE HONORABLE BETH LABSON FREEMAN  
27 UNITED STATES DISTRICT JUDGE  
28